Attorney Docket No. 59005(49357)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: Roland E. **VILLACORTA et al.**

Application No.: 10/685,865

Filed: October 15, 2003

For: **SYSTEM AND METHOD FOR MANAGING CREDIT RISK FOR INVESTMENT PORTFOLIOS**

Art Unit: 3691

Examiner: Shrestha, Bijendra K.

Confirmation No.: 5769

Mail Stop Amendment
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

RESPONSE UNDER 37 C.F.R. § 1.111

Applicant submits this document in response to the Office Action mailed December 8, 2010.

Amendments to the Claims begin on page 2 of this paper.

Remarks begin on page 6 of this paper.

The Director is hereby authorized to charge any fee deficiency and credit any excess fee for any paper submitted in connection with this application to our Deposit Account No. 04-1105, under Order No. 59005(49357).

CERTIFICATE OF TRANSMISSION

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with 37 C.F.R. § 1.6(a)(4).

Dated: April 8, 2011 Signature: /Jacob P. Martinez #57924/ (Jacob P. Martinez)